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*Counsel for Lead Plaintiff Bradley Sostack*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH (RMI)  
Formerly Consolidated/Related  
Case No. 4:21-cv-06518 (Closed 9-27-21)

**CLASS ACTION**

This Document Relates to:

All Actions

**DECLARATION OF LEAD PLAINTIFF  
BRADLEY SOSTACK IN SUPPORT OF  
CLASS CERTIFICATION**

Consolidated Complaint Filed: August 5,  
2019  
Trial Date: July 17, 2023  
Motion Cutoff: January 14, 2022  
Discovery Cutoff: April 15, 2022

1 I, Bradley Sostack, hereby declare as follows:

2 1. I make this declaration in support of the Motion for Class Certification. I have  
3 personal knowledge of the facts stated herein, and if called upon as a witness, I would and could  
4 testify competently as to the matters set forth herein.

5 2. I am a resident of Florida.

6 3. Between January 1, 2018, and January 16, 2018, I purchased 128,978.88 XRP on  
7 the Poloniex cryptocurrency exchange for approximately \$307,700 in Bitcoin and USDT. I sold  
8 that XRP between January 9, 2018, and January 17, 2018 for approximately \$189,600 in Bitcoin  
9 and USDT.

10 4. A true and correct copy of a spreadsheet obtained from Poloniex detailing my XRP  
11 trades during this time period is attached hereto as **Exhibit A**.

12 5. I did not purchase XRP for any consumptive use. Rather, I purchased XRP with the  
13 expectation that I would be able to profit from that purchase by selling the XRP later at a higher  
14 price.

15 6. This expectation was based on Ripple's promotional activity, including its repeated  
16 representations that adoption of XRP by financial institutions would increase demand for XRP. I  
17 also expected Ripple to develop and improve the XRP Ledger as well as secure additional  
18 exchanges through which XRP could be traded or sold.

19 7. I am knowledgeable about the nature of this case and am ready and able to serve as  
20 a class representative in this action. I have dedicated a significant amount of time to this case and  
21 have been actively working with the law firms Susman Godfrey L.L.P. and Taylor-Copeland Law  
22 on this litigation. I searched for and produced documents responsive to Defendants' requests and  
23 have discussed the status of the case with counsel. I also reviewed the "Motion to Appoint Lead  
24 Plaintiff and Lead Counsel," the consolidated complaints, and the oppositions to the motion to  
25 dismiss before they were filed with the Court. I am willing to make myself available to testify at  
26 deposition and trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

*Bradley Sostack*  
Bradley Sostack